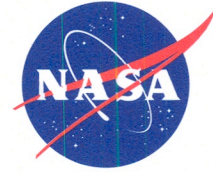


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



September 8, 2011

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the
Women in Aerospace (WIA) Continental Breakfast on September 8, 2011

On September 8, 2011, Women In Aerospace (WIA), a non-profit organization under Section 501(c)(6) of the IRS Code, will host a continental breakfast and panel discussions at the Reagan National Airport, Historic Terminal A in Washington, D.C., from 8:30 am – 12:30 pm. The purpose of this event is to honor the 10th anniversary of the attacks of September 11th.

Approximately, 2,500 people were invited but only 60 – 70 people are expected to attend. This conference will include attendees from the aerospace industry, various government agencies and entities, academia, and the media. The estimated cost of the breakfast, which includes all food and beverages, is \$20 per person. I find that the luncheon meets the requirements of a “widely-attended gathering” as defined in 5 C.F.R. §2635.204(g)(2).

I have determined that free attendance at the above-mentioned luncheon is in the interest of the Agency because it will further agency programs and operations. Accordingly, NASA employees whose duties do not substantially affect the event sponsors, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the event for themselves and their accompanying guest.

However, NASA employees whose duties may substantially affect the event sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. §2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone